

EXHIBIT 28

Jonathan White

May 05, 2022

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO)
ENTERO, et al,)
)
Plaintiffs,)
) CIVIL ACTION
VS.)
) NO.: 5:21-cv-844 (XR)
STATE OF TEXAS, et al,) (Consolidated Cases)
)
Defendants.)
)

ORAL DEPOSITION OF

JONATHAN WHITE

Designated Representative for the Office of the Texas
Attorney General

MAY 5, 2022

ORAL DEPOSITION OF JONATHAN WHITE, produced as a
witness at the instance of the DEFENDANTS, and duly
sworn, was taken in the above-styled and numbered cause
on May 5, 2022, from 10:02 a.m. to 4:06 p.m. before Miah
Parson, CSR in and for the State of Texas, reported by
oral stenography, at the Offices of the Attorney General
300 W. 15th Street Austin, Texas 78701, pursuant to the
Federal Rules of Civil Procedure and the provisions
stated on the record or attached hereto.

1 conference.

2 Q. Okay. When was it created?

3 A. I couldn't tell you.

4 Q. Okay. No problem. Can you please turn to Page
5 054634?

6 A. Yes, sir.

7 Q. So at the top of this page it says, Most Common
8 Offenses and lists vote harvesting or mail ballot fraud
9 assistance fraud and illegal voting; is that correct?

10 A. Yes, sir.

11 Q. Is it still accurate to say that the OAG's
12 three most prosecuted types of offenses under the
13 election code are these three?

14 A. I think that's fair and I would consider these
15 categories --

16 Q. Okay.

17 A. -- of offenses.

18 Q. Okay. Are mail ballot related crimes a top
19 priority for the OAG?

20 A. What I can say is that mail ballot fraud cases
21 comprised are more common than any other form of
22 election fraud case. So we're responsive obviously to
23 the prevalence of those offenses.

24 Q. Okay. Are voter assistance related crimes a
25 top priority for the OAG?

1 questions and we have checked with our colleagues who
2 are on by Zoom and they don't -- they indicate that they
3 have no further questions. So it's my understanding the
4 private Plaintiffs have concluded their examination of
5 Mr. White during the 30(b)(6) deposition of the Office
6 of the Attorney General.

7 MR. HUDSON: We will request a read and
8 sign and we'll reserve.

9 THE REPORTER: The time is 4:06 p.m. and we
10 are off the record.

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